

UNITED STATES DISTRICT COURT

for the  
District of Arizona

In the Matter of the Search of:  
Starla Shaffer and Vanessa Gonzalez' residence, a tan colored  
structure with attached garage, located at 2150 East Jackson  
Circle, Mohave Valley, Arizona 86440, which is a single  
family dwelling located on the Fort Mojave Indian  
Reservation, with GPS coordinates 34.85203, -114.58411

Case No. 22-9368 MB

ELECTRONICALLY ISSUED SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the District of Arizona:

As further described in Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal:

As set forth in Attachment B.

**YOU ARE COMMANDED** to execute this warrant on or before 10/6/2022 (not to exceed 14 days)  
☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to any United States Magistrate Judge on criminal duty in the District of Arizona.

☐ I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized ☐ for 30 days (not to exceed 30) ☐ until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued: 9/22/2022@9:36am

E. Willett  
Judge's signature

City and state: Phoenix, Arizona

Honorable Eileen S. Willett, U.S. Magistrate Judge  
Printed name and title

**ATTACHMENT A****DESCRIPTION OF PROPERTY TO BE SEARCHED**

Starla Shaffer and Vanessa Gonzalez' residence, a tan colored structure with attached garage, located at 2150 East Jackson Circle, Mohave Valley, Arizona 86440, which is a single family dwelling located on the Fort Mojave Indian Reservation, with GPS coordinates 34.85203, -114.58411. The property to be searched includes anything within the curtilage, to include porch, sheds, vehicles, and persons on the premises likely to possess any of the items to be searched for as included in Attachment B.



**ATTACHMENT B – THINGS TO BE SEARCHED FOR AND SEIZED**

1  
2  
3 1. Any DNA evidence and/or evidence of child abuse, including, but not limited  
4 to, dried blood or bodily fluids and/or substances that appear to be blood or bodily fluids,  
5 which may be on the floors, walls, clothing, bedding, furniture, or items used to clean up  
6 same (such as cloth towels, washcloths, or paper towels).

7 2. Any items of evidence that may be readily used as a disciplinary objects,  
8 including belts, shoes, and hangers and/or that otherwise appear to be items consistent with  
9 pattern injuries and bruising on the body of Jane Doe 1.

10 3. Any unlawfully possessed controlled substances, including marijuana,  
11 Tetrahydrocannabinol (THC), methamphetamine, or substances appearing to be  
12 methamphetamine (e.g., white crystalline substances).

13 4. Any drug paraphernalia for storing, smoking, ingesting, and/or using  
14 unlawfully possessed controlled substances (e.g., marijuana), including baggies, pipes, and  
15 other smoking devices.

16 5. Any products/items containing Cannabidiol (CBD), CBD Oil, CBD infused  
17 drinks, CBD infused food, and items of the like.

18 6. Any Closed-Circuit Television (CCTV) recording devices to include baby  
19 monitors, surveillance cameras, recording devices, digital voice recorders, digital  
20 recording devices, cellular telephones.

21 7. Any cellular telephones phones belonging to S.S. and/or V.G. (If recovered,  
22 separate search warrants will be sought to search such devices.)

23 8. Any and all medical records pertaining to Jane Doe 1.

24 9. Indicia of ownership, occupancy, and/or use of the residence, including such  
25 things as mail, (e.g., bills) that may be addressed to the occupant(s); driver's licenses and/or  
26 identification cards; and photographs of the owners and/or occupants of the structure.

27 10. Photographs and measurements of the residence and things located therein  
28 and/or seized.

AO 106 Application for a Search Warrant

## UNITED STATES DISTRICT COURT

for the  
District of Arizona

In the Matter of the Search of  
Starla Shaffer and Vanessa Gonzalez' residence, a tan colored  
structure with attached garage, located at 2150 East Jackson  
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family dwelling located on the Fort Mojave Indian  
Reservation, with GPS coordinates 34.85203, -114.58411

Case No. 22-9368 MB

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

As further described in Attachment A

located in the District of Arizona, there is now concealed:

As set forth in Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code/Section	Offense Description
18 U.S.C. §§ 1153 and Arizona Revised Statutes 13- 3623	Child Abuse

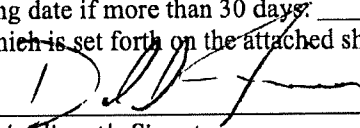
The application is based on these facts:

See attached Affidavit of Special Agent

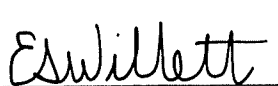
☒ Continued on the attached sheet.

☐ Delayed notice of 30 days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested  
under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Reviewed by AUSA /s/ Sharon K. Sexton  
**SHARON**  
**SEXTON**  
Digitally signed by  
SHARON SEXTON  
Date: 2022.09.22  
08:43:03 -07'00'

  
Applicant's Signature

Donald Ferreira, FBI Special Agent  
Printed name and title

  
Judge's signature

Honorable Eileen S. Willett, U.S. Magistrate Judge  
Printed name and title

Sworn to telephonically.

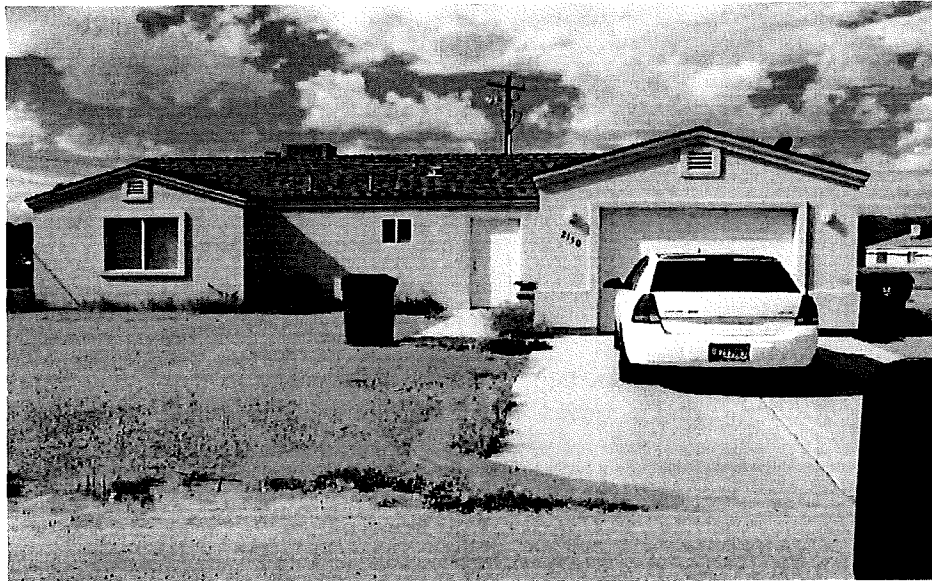
Date: 9/22/2022@9:36am

City and state: Phoenix, Arizona



**ATTACHMENT A****DESCRIPTION OF PROPERTY TO BE SEARCHED**

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**ATTACHMENT B – THINGS TO BE SEARCHED FOR AND SEIZED**

1. Any DNA evidence and/or evidence of child abuse, including, but not limited to, dried blood or bodily fluids and/or substances that appear to be blood or bodily fluids, which may be on the floors, walls, clothing, bedding, furniture, or items used to clean up same (such as cloth towels, washcloths, or paper towels).

2. Any items of evidence that may be readily used as a disciplinary objects, including belts, shoes, and hangers and/or that otherwise appear to be items consistent with pattern injuries and bruising on the body of Jane Doe 1.

3. Any unlawfully possessed controlled substances, including marijuana, Tetrahydrocannabinol (THC), methamphetamine, or substances appearing to be methamphetamine (e.g., white crystalline substances).

4. Any drug paraphernalia for storing, smoking, ingesting, and/or using unlawfully possessed controlled substances (e.g., marijuana), including baggies, pipes, and other smoking devices.

5. Any products/items containing Cannabidiol (CBD), CBD Oil, CBD infused drinks, CBD infused food, and items of the like.

6. Any Closed-Circuit Television (CCTV) recording devices to include baby monitors, surveillance cameras, recording devices, digital voice recorders, digital recording devices, cellular telephones.

7. Any cellular telephones phones belonging to S.S. and/or V.G. (If recovered, separate search warrants will be sought to search such devices.)

8. Any and all medical records pertaining to Jane Doe 1.

9. Indicia of ownership, occupancy, and/or use of the residence, including such things as mail, (e.g., bills) that may be addressed to the occupant(s); driver's licenses and/or identification cards; and photographs of the owners and/or occupants of the structure.

10. Photographs and measurements of the residence and things located therein and/or seized.

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA  
**ELECTRONICALLY SUBMITTED AFFIDAVIT**

I, FBI Special Agent Donald Ferreira, state under oath as follows:

1. I am employed as a Special Agent (SA) of the Federal Bureau of Investigation (FBI), and have been so employed since September 2015. I have more than 7 years of experience as a sworn federal law enforcement officer. I am currently assigned to the FBI Phoenix Division, Lake Havasu City Resident Agency, and charged with the investigation of crimes occurring in (among other places) Mohave County, Arizona. My duties include the investigation of violent crimes occurring within Indian Country as well as child abuse/ neglect crimes within the District of Arizona.

2. The information contained in this affidavit is based upon my personal knowledge, training, experience, as well as information provided by other law enforcement officers and witnesses including those listed herein. I have not included every fact known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause to support issuance of the requested search warrant.

3. This affidavit is in support of an application for a search warrant to search the residence of Starla Shaffer hereinafter (S.S.), and Vanessa Gonzalez (V.G.), a tan colored structure with attached garage, located at 2150 East Jackson Circle, Mohave Valley, Arizona 86440, which is a single family dwelling located on the Fort Mojave Indian Reservation, with GPS coordinates 34.85203, -114.58411. The property to be searched includes the residence, (inside and out), porch, sheds, curtilage, and vehicles located on the residence as set forth in Attachment A. I will be seeking evidence of violations of Title 18, United States Code, §1153 and Arizona Revised Statutes (ARS) § 13-3623 Child Abuse. The items to be searched for and seized are particularly described in Attachment B.

#### **Background/Introduction**

4. This case involves the child abuse of a 3-year-old female child, Jane Doe 1, by her guardian, S.S., and S.S.'s domestic partner, V.G., in violation of Title 18, United States Code, §1153 and Arizona Revised Statutes (ARS) § 13-3623.

5. In approximately January 2022, S.S. – who is in an adult female (age 33) became the Fort Mojave Tribal Court legal guardian of Jane Doe 1, a minor (age 3), and Jane Doe 2, a minor (age 15). On September 20, 2022, Emergency Medical Services (EMS) responded to 2150 East Jackson Circle, Mohave Valley 86440, regarding a call of a child, later identified as 3-year-old Jane Doe 1 who had seizure related medical issues at her home address of 2150 East Jackson Circle, Mohave Valley, Arizona 86440. Upon EMS taking Jane Doe 1 to the Valley View Medical



Center (VVMC), medical personnel observed multiple bruises on her face, legs, back, and severe bruising on her buttocks. Valley View Medical Personnel contacted the Fort Mojave Tribal Police Department (FMTPD) to report suspected child abuse. Based on Jane Doe's injuries, she was flown to Sunrise Hospital located in Las Vegas, Nevada for advanced medical treatment. Upon arrival, after a complete medical evaluation, it was discovered that Jane Doe 1 had multiple skull fractures, retinal tearing, and bruising over multiple parts of her body. Upon initial separate interviews with S.S and V.G., both S.S. and V.G. admitted to disciplining Jane Doe 1 by spanking, slapping, and swatting Jane Doe 1, both when Jane Doe 1 misbehaved as well as when she was having seizures.

### **Investigation**

6. On September 20, 2022, at approximately 9:01 P.M., EMS responded to the known residence of S.S. and V.G. located at 2150 East Jackson Circle, Mohave Valley 86440. S.S. had contacted EMS after Jane Doe 1 had suffered a seizure and appeared to have medical complications resulting from that seizure. Upon arrival at the residence, EMS workers transported Jane Doe 1 to the Valley View Medical Center (VVMC) located at 5300 Arizona 95, Fort Mohave, Arizona 86426 for further medical care. Upon Jane Doe 1's arrival at VVMC, it was discovered that she had multiple bruises on her face, legs, back, and severe bruising on her buttocks. Additionally, VVMC staff determined that Jane Doe 1 tested positive for Tetrahydrocannabinol (THC) a known compound in marijuana. Due to the severity

of the injuries, and testing positive for THC, VVMC personnel contacted officers from the Fort Mojave Tribal Police Department after suspecting possible child abuse.

7. Fort Mojave Tribal Police Department Officer Anthony Diaz responded to the VVMC and photographed the injuries of Jane Doe 1.

8. Based on the medical condition of Jane Doe 1, VVMC made the determination that she needed to be transported via helicopter to Sunrise hospital located at 3186 South Maryland Parkway, Las Vegas, Nevada 89109.

9. Shortly after, FMTPD Officer Bellarmino Diaz (B. Diaz) responded to the hospital and conducted separate interviews of S.S. and V.G. (Note: Officers from the FMTPD know S.S. and V.G. from the community as domestic partners.) Officer B. Diaz learned that S.S. lived with her domestic partner V.G., her nieces Jane Doe 1, and Jane Doe 2. In approximately January 2022, S.S. became the legal guardian of Jane Does 1 and 2 and had remained their legal guardian until present. V.G. was not the legal guardian of either girls.

10. Both minor children lived with S.S. and V.G. at their residence since approximately January 2022 to present. As of September 21, 2022, Jane Doe 1 and 2 have been removed from the home and temporarily placed in the custody of the Fort Mojave Tribal Social Services.

11. FMTPD Officer B. Diaz conducted an interview of S.S. During the interview, S.S. was read her Miranda Rights and S.S. agreed to speak with Officer B. Diaz. S.S. advised Officer B. Diaz that Jane Doe 1 recently began having seizures. S.S. advised that both she and V.G. slapped, and swatted Jane Doe 1 while she was having seizures. S.S. admitted to striking, spanking, and swatting Jane Doe 1 on her buttocks as well as her face, back, and body. S.S. admitted to swatting Jane Doe 1 with her hand and her sandal. S.S. advised that while Jane Doe 1 had a seizure, S.S. would slap Jane Doe 1 on her face and back, as well as pinch and bite her. S.S. advised Officer B. Diaz that she had a baby monitor camera in Jane Doe 1's room as well as C.D.'s room and the camera was linked to her cell phone. S.S. had seen V.G. yell at Jane Doe 1 on the baby monitor while S.S. was at work.

12. Officer B. Diaz conducted an interview of V.G. During her interview, V.G. was read her Miranda Rights and V.G. agreed to speak with Officer B. Diaz. V.G. advised Officer B. Diaz that she had disciplined Jane Doe 1 on multiple occasions with her hand by striking Jane Doe 1 on her butt and back. She also admitted that she had pushed on Jane Doe 1's chest, slapped her back, and slapped her face to get her to wake up. During the interview, V.G. admitted to giving Jane Doe 1 CBD oil in liquid form because she heard it helped with seizures. V.G. also admitted to slapping Jane Doe 1 on the face, taking Jane Doe 1 to the bathtub, bending Jane Doe 1 over, and spanking Jane Doe 1's butt. V.G. advised that she slapped Jane Doe 1's face until it began to bruise at which point, she began slapping

her butt. V.G. advised that she had also witnessed S.S. discipline Jane Doe 1 on a baby monitor camera located at their residence.

13. V.G. made statements to Officer B. Diaz that she watched and recorded videos of Jane Doe 1 when she was misbehaving. V.G. stated that she had a video recording of her spanking Jane Doe 1 because it was done in front of the camera.

14. Both S.S. and V.G. admitted to Officer B. Diaz that they provided Jane Doe 1 with Cannabinol Oil (CBD) in liquid form. Both S.S. and V.G. admitted that they were the two primary caregivers for Jane Doe 1 and that no one else was responsible for her care. Both S.S. and V.G. admitted that the abuse committed against Jane Doe 1 was committed at their home, the subject premises.

15. Based on my training, education, and experience, I am aware that some CBD infused products, including oils, creams, and liquids can be rubbed on the body or inhaled and are typically used to treat chronic pain. Some of the infused CBD products may, or may not contain Tetrahydrocannabinol (THC).

16. Based on my training, education, and experience, I am aware that THC is the principal psychoactive constituent of cannabis and a known lipid found in cannabis. THC is an active constituent in the drug Marijuana. Cannabis as a plant, is considered a Schedule 1 narcotic and is considered Federally illegal.

17. Both S.S. and V.G. admitted to Officer B. Diaz that V.G. smoked marijuana in the home. V.G. admitted to Officer B. Diaz that she smoked Marijuana

approximately three times a day and even did so while Jane Doe 1 was having a seizure to help herself decompress.

18. On September 21, 2022, Officer B. Diaz contacted Federal Bureau of Investigation (FBI) Special Agent (SA) Kemper Mills regarding the interviews and concerning statements made by both S.S. and V.G. Officer B. Diaz requested the assistance of the FBI.

19. On September 21, 2022, I was provided with multiple photos of Jane Doe 1 taken by Officer A. Diaz the night before. In discussing this matter with various medical personnel and viewing the photographs of Jane Doe 1's injuries, I understand that the abuse disclosed by the two caregivers do not explain the totality of the victim's injuries, and the injuries remain highly concerning for non-accidental, inflicted trauma.

20. During the investigation it was learned that upon EMS arriving and advising S.S. that Jane Doe 1 needed to be transported to VVMC, S.S. advised paramedics that she needed to go back inside the home to retrieve her phone before Jane Doe 1 could be escorted. This was despite the emergency condition of Jane Doe 1.



21. Based on my training, education, and experience I am aware that cellular telephones can be used to communicate and send Short Message Service (SMS) text messages to another individual. Those text messages could contain valuable time stamps, data, metadata, and other valuable digital information that contain indicia of a criminal act.

22. Based on my training, education, and experience, it is common for caregivers, especially those in a close personal relationship, to communicate about the care and condition of their children, as well as incidents involving their children, via telephone calls and text messages. It is particularly common for these persons to communicate about their children after the child suffers an injury, and/or where one or more of the persons has been interviewed regarding possible abuse of the child. Given the unexplained and suspicious injuries to Jane Doe 1, S.S. and V.G.'s roles as primary caregivers to the child, and S.S. retrieving her cell phone before going to the hospital, I submit there is probable cause to believe that evidence of the subject crime may be found within the phones of S.S. and V.G.

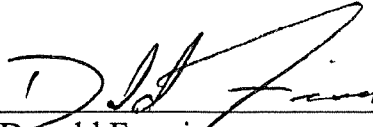
### **Conclusion**

23. Based upon my training, experience, and observations, I submit that there is probable cause to believe that there is evidence of violations of federal law, specifically Title 18, United States Code, § 1153 and ARS § 13-3623 and that the evidence of such violations is contained within the residence of S.S. and V.G. located at 2150 East Jackson Circle, Mohave Valley, Arizona 86440 and within the

phones of S.S. and V.G. Based on the aforementioned factual information, I respectfully request that a warrant be issued for the search of the location described in Attachment A, for the items further described in Attachment B.

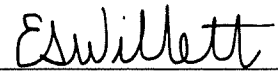
**Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.**

Executed on: \_\_\_\_\_

  
\_\_\_\_\_  
Donald Ferreira  
Special Agent, FBI

  X   Sworn by Telephone

Date/Time: 9/22/2022@9:36am

  
\_\_\_\_\_  
Honorable Eileen S. Willett  
United States Magistrate Judge